

Responses to Comments in Letter 153 from Robert Loch, Custer Resident

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the preceding comment letter.

1. Thank you for your comments.
2. The 115 kV transmission lines have been eliminated as an alternative. Thus, all power would flow into Canada via the 230 kV transmission line.
3. The location of the facility is based on size, proximity to available utilities and gas pipeline easement, compliance with City of Sumas zoning and comprehensive plans, access to the site, and availability of the property. In addition, the Washington Administrative Code states:

“When a proposal is for a private project on a specific site, the lead agency shall be required to evaluate only the no action alternative plus other reasonable alternatives for achieving the proposal’s objective on the same site.” (WAC 197-11-440 (5)d).
4. See Letter 134, Response to Comment 8.
5. See Letter 150, Response to Comment 8, for discussion of the purpose of diesel fuel.
6. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project. Therefore, distances to the 115 kV line are no longer an issue.
7. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project.
8. Thank you for your comment.
9. In accordance with WAC 463-42-655, SE2 prepared an initial plan for site restoration at the conclusion of the project’s operating life. It is included in Section 7.3 of the Application for Site Certification.
10. Please see Letter 148, Response to Comment 1 for discussion of the EIS process.
11. The 115 kV transmission lines have been eliminated as an alternative. See Letter 162, Response to Comment 1 for discussion of transmission grid impacts.
12. Please see Letter 153, Response to Comment 10 (above).
13. Please see Letter 153, Response to Comment 3 above.
14. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project. Therefore, distances to the 115 kV line are no longer an issue.

15. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project. Therefore, EMF related to the 115 kV lines is no longer an issue.
16. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project. Therefore, property value impacts related to the 115 kV lines are no longer an issue.
17. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project.
18. The 97 percent capacity factor was used to allow determination of maximum fuel consumption and resulting environmental impacts.
19. See Letter 134, Response to Comment 8. The applicant's decision on operating equipment for the proposed facility is beyond the scope of the environmental review process. The Draft BACT analysis prepared for the project has identified selective catalytic reduction as NO_x BACT for the proposed project. NO_x emissions would be limited to a 1-hour average concentration of 2 ppm_{dv} when burning natural gas and 6 ppm_{dv} when burning low-sulfur oil, corrected to 15 percent oxygen. The Draft BACT analysis has also identified catalytic oxidation as BACT for CO, with emissions limited to a 1-hour average concentration of 2 ppm_{dv} when burning natural gas and 12 ppm_{dv} when burning low-sulfur oil, corrected to 15 percent oxygen. (Exhibit 170.2, page 13).
20. The air quality impact analysis assumed the oil-firing for up to 15 days per year in the event of gas shortages. As a result, the impact analysis represents a worst-case analysis. Under this worst-case analysis, the proposed project would not result in violations of applicable air quality standards. In addition, the applicant has agreed to further limit oil-firing to 10 days per year averaged over a 10-year period (Exhibit 154.6, page 2).
21. Thank you for your comments.
22. Please see Letter 153, Response to Comment 20 (above).
23. See Letter 153, Response to Comment 9 (above).